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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

v.

CHRISTOPHER BRYAN ABLETT,

Defendant.

No. CR 09-0749 RS

REVISED STIPULATION AND
~~PROPOSED~~ REVISED PROTECTIVE
ORDER

The United States of America, by its attorneys, Melinda Haag, United States Attorney, and Christine Y. Wong, Assistant United States Attorney, of counsel, and the defendant, Christopher Bryan Ablett, by his attorneys, Michael Burt, Esq., and Richard Mazer, Esq., hereby stipulate to the following Protective Order:

1. Disclosure and dissemination of certain materials relating to the above-captioned matter may jeopardize the safety of certain individuals who may be witnesses, victims, and/or their families and friends. Such individuals are referenced herein as "Protected Witnesses."

1 2. The term “Protected Material” applies to any and all materials and/or information
2 that disclose or reasonably suggest the identity or whereabouts of Protected Witnesses, including
3 Social Security Number, dates of birth, driver’s license numbers, and other such personal
4 information. Protected Materials shall be marked as such.

5 3. In order to ensure the safety of Protected Witnesses and/or their families and
6 friends, dissemination and possession of the Protected Material shall be limited only to counsel
7 for the defendant, Michael Burt, Esq., and Richard Mazer, Esq., and their secretarial and clerical
8 personnel, including paralegals and investigators (“defense counsel”). Defense counsel and
9 anyone in their employ who are given access to Protected Material shall review and agree to
10 comply with this Protective Order. Defense counsel shall be responsible for ensuring that
11 Protected Material not be disseminated to and/or possessed by anyone not authorized by this
12 Protective Order. In addition, defense counsel shall not disclose identifying information
13 contained in Protected Material to anyone — including the defendant — except in accordance
14 with the terms of this Protective Order.

15 4. Possession and use of the Protected Material by defense counsel are only for the
16 purpose of preparing for and trying the criminal case of the defendant and for no other purpose.
17 Other than these purposes, the Protected Material shall not be distributed, shown, or
18 disseminated to anyone else. Beginning 21 days before trial, the defendant may review
19 Protected Material in the presence of defense counsel, but Protected Material shall not be left in
20 the custody of the defendant.

21 5. At the end of the trial of the defendant, defense counsel shall return all the
22 Protected Material, and any and all copies of the Protected Material, to the Government, which
23 will preserve the materials in case there is need for them in any future litigation.

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1 SO STIPULATED.

2 Respectfully submitted,

3 MELINDA HAAG
4 United States Attorney

5 Dated: August 26, 2011

6 /S/
CHRISTINE Y. WONG
Assistant United States Attorney

7
8 Dated: August 26, 2011

9 /S/
MICHAEL BURT, ESQ.
RICHARD MAZER, ESQ.
Attorneys for Christopher Bryan Ablett

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11 SO ORDERED.

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13 Dated: August 26, 2011

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HON. RICHARD SEEBORG
United States District Judge